

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

CONDITIONAL MAJOR DRAFT PERMIT # F-05-006 R2  
EMERSON POWER TRANSMISSION CORPORATION  
MAYSVILLE, KENTUCKY  
DECEMBER 15, 2008  
FROUGH SHERWANI  
PLANT I.D. # 21-161-00001  
AI # 3005  
ACTIVITY #: APE20080001

**MINOR PERMIT REVISION - F-05-006 R2**

On November 19, 2008 the Division received an application from the source for the following;

1. Consolidating its two Maysville locations (526 Clark Street and 1248 East Second Street) into the one remaining facility located at 1248 East Second Street. During this move several emission sources will either move to the main plant or be disposed. The Clark Street location (will be leased from the new owner) will house Emission Point # 1 (Manual Spray Booth (20)) and Emission Point # 7 (Powder Paint Spray Booth (20)).
2. Updating Emission Point # 15 (Coolant) information at the facility.

**Revision 1 (Permit # F-05-006 (R1))**  
**Minor Permit Revision**

On July 10, 2006 the source applied to the Division for the installation of a solvent distillation unit called "The Minimizer" and four paint gun cleaners. The solvent distillation unit (Model 709 Minimizer<sup>TM</sup>) is a closed system that recycles the spent solvents while no VOC are emitted into the atmosphere (except opening and closing). The paint gun cleaners will automate the cleaning process at each manual spray booth.

On October 11, 2005 the source has also applied to the Division to revise the permit to reflect actual emissions points.

In addition, on September 12, 2005 the source submitted an application to add a new Lacquer-based paint to their operation. No VOC/HAPS emission increase is expected from this change. Also, the VOC/HAPS caps will remain the same.

**PERMIT # F-05-006**

**Source Description**

Emerson Power Transmission Corporation of Maysville, Kentucky, currently operates three plants that manufacture drive train components.

## COMMENTS;

Emerson Power Transmission Corporation of Maysville, Kentucky, currently operates three plants that manufacture drive train components. The source is consolidating processes from two plants (Plant 1 (021-161-00001) and Plant 3 (021-161-00030)) and discontinuing operations in one (Plant 2 (021-161-00029)). The existing three plants have permits # O-86-38, O-94-007, S-96-223 (Revision 2) and VS-04-003. The consolidated plant (021-161-00001) will have conditional major permit F-05-006. With the consolidation of the plants, the source is proposing to add three spray booths and 11 combustion sources.

Once construction is over the plant will have two powder coat lines, six spray booths, parts washer, welding sources, sandblasting, arc cutting, machining and coolant, space heaters, and combustion sources.

### **Type of control and efficiency:**

<b>EP 01</b>	<b>Powder Coat Line</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	98%
<b>EP 02</b>	<b>Powder Coat Line</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	98%
<b>EP 03</b>	<b>Manual Spray Booth</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
<b>EP 04</b>	<b>Manual Spray Booth</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
<b>EP 05</b>	<b>Manual Spray Booth</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
<b>EP 06</b>	<b>Manual Spray Booth</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
<b>EP 07</b>	<b>Manual Spray Booth</b>	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%

**EP 09****Machining (5 Mills)**

- Control Equipment Bag Filters/Dust Collector
- Estimated Control Efficiency 95%

**Machining (9 Mills)**

- Control Equipment Amtech Dust Collector
- Estimated Control Efficiency 95%

**Machining (5 Mills)**

- Control Equipment Dust Collector
- Estimated Control Efficiency 95%

**Emission factors and their source:**

A combination of material balances and AP-42 emission factors were used to estimate emissions.

**Applicable regulations:**

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 63:020**; Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.
- c. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

**Precluded Regulations:**

- a. **401 KAR 59:225**, New miscellaneous metal parts and products surface coating operations.
- b. **40 CFR 63 Subpart M**, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

**EMISSION AND OPERATING CAPS DESCRIPTION:**

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 60 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

**PERIODIC MONITORING:**

This permit requires monthly records of material usage and emissions to demonstrate compliance with the 12 month emission limitations.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.